

As an electrical engineer and amateur-radio licensee, I have read with great interest the available documentation on BPL. I am extremely concerned with a system using the concept of unshielded transmission of broadband HF signals. The probability of broadband, uncontrolled emissions is 100%, hence the probability of interference to licensed services is 100%. It is also likely that interference to BPL systems by legal transmissions by licensed HF and VHF services.

Looking at the history of deployed BPL systems in the United States and other countries, the interference issue is unavoidable. It is contrary to the basic philosophy upon which the FCC is based to allow or encourage the deployment of an uncontrolled, broadband, radiating system, knowing from all data sources that serious interference issues will arise.

As a licensed amateur-radio licensee who is heavily involved in using the amateur-radio service to provide emergency communication support to local public-safety and disaster-relief agencies, it is imperative that the amateur-radio service be provided with clear frequency bands to provide that support. Per recent initiatives put into place by several federal and state agencies (such as Citizen Corps through DHS), the amateur-radio service has willingly made itself available to support those initiatives. The amateur-radio service is a national resource that must be respected, maintained, and protected.

I respectfully request that the FCC reject any proposal for systems which would radiate broadband emissions throughout previously-allocated spectrum for licensed services. It is the fundamental responsibility of the FCC to protect spectrum, not allowing duly-licensed services to suffer spectrum pollution and interference.

Thank you for considering my comments.